

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

|   |   |                                    |
|---|---|------------------------------------|
| Mother Doe, individually and as the Mother  | ) |                                    |
| and Natural Guardian for Jane Doe, a Minor, | ) |                                    |
|   | ) | CIVIL ACTION NO. 3:18-cv-02731-CMC |
| Plaintiff,                                  | ) |                                    |
|   | ) |                                    |
| vs.   | ) | <b>DEFENDANT JAMEL BRADLEY’S</b>   |
|   | ) | <b>FED.R.CIV.P. RULE 26(a)(3)</b>  |
|   | ) | <b>DISCLOSURES</b>                 |
| Richland County School District Two,        | ) |                                    |
| Sheriff of Richland County in his official  | ) |                                    |
| capacity d/b/a Richland County Sheriff’s    | ) |                                    |
| Department (“RCSD”), and Jamel Bradley,     | ) |                                    |
|   | ) |                                    |
| Defendants.                                 | ) |                                    |
|   | ) |                                    |
|   | ) |                                    |

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Pursuant to Fed.R.Civ.P. Rule 26(a)(3), Defendant Jamel Bradley makes the following disclosures:

1. The name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises.

**RESPONSE:**

**The Defendant Jamel Bradley may call the following witnesses at trial if the need arises:**

- A. Stacey Baker, Spring Valley High School, 120 Sparkleberry Ln., Columbia, SC 29229; c/o Richland County School District Two;**
- B. Jamel Bradley, 303 Ashley Place, Columbia, South Carolina 29229; 803-319-7608;**
- C. Cpt. John E. Ewing, Jr.; c/o Richland County Sheriff’s Department, 5623 Two Notch Rd., Columbia, SC 29202;**
- D. Martha Fenske, 1401 Hampton St., Columbia, SC 29201; 972-615-2596;**
- E. Allison M. Foster, Ph.D., South Carolina Network of Children’s Advocacy Centers, Columbia, SC;**

- F. Cpt. Heidi Jackson; c/o Richland County Sheriff's Department, 5623 Two Notch Rd., Columbia, SC 29202;**
- G. Dpty. Keenan Johnson; c/o Richland County Sheriff's Department, 5623 Two Notch Rd., Columbia, SC 29202;**
- H. Dpty Briana Kramer; c/o Richland County Sheriff's Department, 5623 Two Notch Rd., Columbia, SC 29202;**
- I. Lt. Chris Lindler; c/o Richland County Sheriff's Department, 5623 Two Notch Rd., Columbia, SC 29202;**
- J. Deputy Chief Stan Smith; c/o Richland County Sheriff's Department, 5623 Two Notch Rd., Columbia, SC 29202;**
- K. Jeff Temoney; Spring Valley High School, 120 Sparkleberry Ln., Columbia, SC 29229; c/o Richland County School District Two;**
- L. Susan Yelverton, LMSW, Adolescent Recovery, Palmetto Health, Columbia, SC; 803-296-2332.**

**The Defendant Bradley reserves the right to call any witness identified by the Plaintiffs or co-Defendants.**

2. The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.

**RESPONSE: Defendant Jamel Bradley does not anticipate presenting witness testimony by deposition.**

**This Defendant is further advised that the Plaintiffs may present witness testimony by deposition, and in the event Plaintiffs do designate excerpts from other witnesses' depositions, this Defendant may have counter designations.**

3. An identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.

**RESPONSE:** The Defendant Jamel Bradley may offer the following exhibits if the need arises:

- A. Ewing April 17, 2018 Memorandum; 3 pages; Bates Numbered 00432-C-004 through -006;**
- B. Baker email to Lindler, dated April 25, 2018, with Type-written notes of 3/22, 4/9, 4/16, and 4/17/18 contact with or about the minor Plaintiff, Jane Doe; 5 pages; Bates Numbered 00432-D-005 through -009;**
- C. RCSD Incident Report 1804016717, dated 04/17/2018; 3 pages; Bates Numbered 00432-C-007 through -009;**
- D. RCSD Incident Report 1804016717, dated 04/17-18/2018; 4 pages; Bates Numbered 00432-C-013 to -016;**
- E. Palmetto Health Baptist Richland Parkridge History and Physical “Final Report” for Jane Doe, September 8, 2017 through September 12, 2017; 5 pages; Bates Numbered Montcrief 000024 to 000028;**
- F. Initial Adolescent PHP/IOP Physician Psychiatric Evaluation, March 29, 2018; 4 pages; Bates Numbered 00432-D-034 to -037;**
- G. Martha Fenske Statement/Affidavit, April 19, 2018; 5 pages; Bates Numbered 00432-D-027 through -031;**
- H. Children’s Advocacy Centers Forensic Interview Report of Allison M. Foster, Ph.D., from 04/18, 20/2018; 3 pages; Bates Numbered 00432-D-040 to -042;**
- I. Videos of Forensic Interviews of Jane Doe with Allison M. Foster, Ph.D., from 04/18, 20/2018;**
- J. RCSD Body Cam Video of Jane Doe Interview with Susan Yelverton, LMSW, from April, 17, 2018;**
- K. Memorandum from RCSD Deputy Chief Stan Smith, 4/30/2018; 1 page; Bates Numbered 00432-N-001.**

**The Defendant Bradley reserves the right to use any document or other exhibit offered and/or placed into evidence by any other party.**

DAVIS FRAWLEY, LLC

*s/Patrick J. Frawley*

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ATTORNEYS FOR JAMEL BRADLEY

Lexington, South Carolina

May 18, 2020